

## REMARKS

Applicants note the filing of an Information Disclosure Statement herein on March 18, 2005 and note that no copy of the PTO-1449 was returned with the outstanding Office Action. Applicants respectfully request that the information cited on the PTO-1449 be made of record herein and that a copy be initialed and returned.

The Office Action mailed November 30, 2005, has been received and reviewed. Claims 1-24 are pending in the application and stand rejected. For the reasons set forth below, claims 1-24 are believed to be in condition to allowance.

### **35 U.S.C. § 103(a) Obviousness Rejections**

Claims 1-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,987,856 to Hey et al. (hereinafter "Hey"). Applicants respectfully traverse this rejection, as hereinafter set forth.

M.P.E.P. 706.02(j) sets forth the standard for a Section 103(a) rejection:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (Emphasis added).

Applicants respectfully submit that the cited reference does not teach or suggest the limitations claimed in the present claim set.

Specifically, the Examiner has noted that Hey discloses a wafer handling apparatus that comprises a load lock through which a rectangular semiconductor wafer may be transported.

The Examiner has taken the position that one skilled in the art would recognize that a

semiconductor wafer is generally rigid and has a uniform cross-sectional profile, as disclosed in independent claims 1 and 14 of the present application, thus rendering the present invention obvious.

Applicants do not concede that the load lock corresponds to the aperture claimed in the present invention, or that the mental leap from a semiconductor wafer as used in Hey to a rigid substrate as disclosed in the present invention is an obvious one. But a more salient point here is that Hey does not teach or suggest a limitation that is part of the claim limitations, as required by M.P.E.P. 706.02(j) cited above. Namely, independent claims 1 and 14 both disclose a device having an aperture, where *that device applies or comprises a coating material*. While Hey does disclose an aperture, the coating used in the chemical vapor deposition process taught by Hey is in no way associated with the portion of the device having an aperture. The chamber in which a coating is applied (*i.e.* via chemical vapor deposition) is entirely separate from the aperture through which a substrate is passed, and the application of a coating in Hey is not dependent upon the nature of the aperture or the act of passing a substrate through the aperture, both of which are aspects of the present claim set. Accordingly, Applicants respectfully submit that the reference cited by the Examiner does not teach or suggest all the claim limitations taught in the present application.

Claims 2-13 and 15-24 depend from independent claims 1 and 14 and therefore also distinguish over Hey as discussed above.

Claims 1-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,785,962 to Toshima (hereinafter “Toshima”). Applicants respectfully traverse this rejection, as hereinafter set forth. Applicants respectfully submit that the cited reference does not teach or suggest, alone or in combination, the limitations claimed in the present claim set.

As with the Hey reference above, the Examiner has noted that Toshima discloses a semiconductor wafer handling apparatus that comprises a chamber through which a rectangular semiconductor wafer may be transported. The Examiner has taken the position that the slit value disclosed by Toshima is equivalent to the aperture of the substrate coating device disclosed in the present application, and further that one skilled in the art would recognize as obvious that coatings may be applied in the environment disclosed by Toshima.

Once again, Applicants do not concede that the slit aperture of Toshima corresponds to the aperture claimed in the present application. But Applicants respectfully point out that Toshima contains no teaching or suggestion that any coating is to be applied; in particular, Toshima makes no suggestion of a coating being applied *at or by the device having an aperture*, as required by the limitations of independent claims 1 and 14. The Examiner has rightly pointed out that coating (via chemical vapor deposition) is a process associated with a vacuum fabrication chamber as disclosed in Toshima. The present application, however, does not disclose applying a coating in a chamber, but rather applying a coating substantially during the traverse of the aperture by a substrate. Nothing of the sort is suggested by Toshima. Accordingly, Toshima does not teach or suggest all the claim limitations found in the present application.

Claims 2-13 and 15-24 depend from independent claims 1 and 14 and therefore also distinguish over Toshima as discussed above.

Because the references cited by the Examiner do not teach or suggest all of the claim limitations in either of the independent claims 1 and 14, Applicants respectfully submit that neither Hey nor Toshima renders the present invention obvious. Applicants respectfully request, therefore, that the Examiner's rejections be withdrawn.

## CONCLUSION

In view of the foregoing, Applicants respectfully submit that claims 1-24 are in condition for immediate allowance. In the event the Examiner finds any remaining impediment to the prompt allowance of any of these claims which could be clarified in a telephone conference, the Examiner is respectfully urged to initiate the same with the Applicants' undersigned attorney.

DATED this 30<sup>th</sup> day of March, 2006.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BSB', followed by a horizontal line and a vertical stroke.

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